

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

CHARLENE LIBERTY, JOHN DAPONTE,
JOHN DAVIS, DUANE GOMES, ADAM
HANRAHAN and CHARLES KENNER,
on behalf of themselves and all others
similarly situated; and
DISABILITY RIGHTS RHODE ISLAND,
on behalf of its constituents,
Plaintiffs,

v.

C.A. No. 19-cv-0573-JJM-PAS

RHODE ISLAND DEPARTMENT OF
CORRECTIONS; PATRICIA COYNE-
FAGUE in her official capacity as the
Director of the Rhode Island Department of
Corrections; MATTHEW KETTLE,
Official Capacity as the Assistant Director of
Institutions and Operations; and BARRY
WEINER in his Official Capacity as the
Assistant Director of Rehabilitation Services
Defendants.

OBJECTION TO PLAINTIFFS' MOTION TO COMPEL INSPECTION

Now come the Defendants and Object to the Plaintiffs' Motion to Compel Inspection. In support hereof, Defendants rely on the attached Memorandum of Law and Exhibits.

Respectfully submitted,

STATE DEFENDANTS

RHODE ISLAND DEPARTMENT OF
CORRECTIONS, PATRICIA COYNE-
FAGUE, in her official capacity of the
Director of the Rhode Island Department
of Corrections; MATTHEW KETTLE, in
his official capacity as Assistant Director
of Institutions and Operations; and
BARRY WEINER, in his official

capacity as Assistant Director of
Rehabilitation Services,

By:

PETER F. NERONHA
ATTORNEY GENERAL

/s/ Brenda D. Baum
Brenda D. Baum #5184
Assistant Attorney General
R.I. Department of Attorney General
150 South Main Street
Providence, RI 02903
Tel: (401) 274-4400 ext. 2294
Fax: (401) 222-2995
bbaum@riag.ri.gov

/s/ Rebecca Tedford Partington
Rebecca Tedford Partington, Esq. (#3890)
DESISTO LAW LLC
60 Ship Street
Providence, RI 02903
(401) 272-4442
(401) 533-9848 – fax
rebecca@desistolaw.com

CERTIFICATION

I hereby certify that on this 8th day of April, 2022, the within document was electronically filed and served on all counsel of record via the ECF system and it is available for viewing and downloading to:

Maria V. Morris, Esq. Tammi Gregg, Esq. ACLU NATIONAL PRISON PROJECT 915 15 th Street, N.W., 7 th Floor Washington, D.C. 20005-2302	
Anne M. Mulready, Esq. Brian Adae, Esq. DISABILITY RIGHTS RHODE ISLAND 33 Broad St., Suite 401 Providence, RI 02903	

Patrick T. Uiterwyk, Esq. James S. Rollins, Esq. Nelson, Mullins, Riley & Scarborough LLP One Financial Center Suite 3500 Boston, MA 02111	

/s/Rebecca Tedford Partington